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Timeline of Correspondance

01/08/2014	Ji Song, newly appointed Power of Attorney (POA), faxed signed POA form to IRS RA – Margarita Villafane.	Attachment 1
01/??/2014	POA requested the Information Documentation Request form (IDR) from RA to prepare documentations.	
01/15/2014	POA received IDR via fax from the IRS.	Attachment 2
01/15/2014	POA responded immediately to a fax received from RA and requested a reasonable time frame to respond to IDR.	Attachment 3
03/??/2014	IRS RA called and talked to POA.	
03/07/2014	POA sent fax to IRS and requested to set up an appointment for a meeting.	Attachment 4
03/21/2014	RA did not set up appointment with POA instead RA summon Tax Payer.	Attachment 5
04/18/2014	Tax Payer could not attend to summon due to illness.	Attachment 6
04/18/2014	POA faxed documentation to RA in response to summon.	Attachment 7
	IRS Agent never responded to the documents sent via fax on 4/18/2014.	
07/07/2014	IRS Attorney sent a letter to Tax Payer regarding summon.	Attachment 8
03/18/2015	Tax payer received a letter from court.	Attachment 9
3/23/2015	Tax Payer mailed response documentation to court.	Attachment 10

^{*}Appendix A - Interview notes with Tax Payer